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March 6, 2015

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**BY ECF and BY HAND**

Hon. Colleen McMahon  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1640  
New York, New York 10007

Re: Moore et al. v. Navillus, et al., Case No. 14-CV-8326 (CM)(JLC)

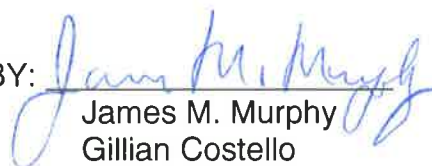
Dear Judge McMahon:

This firm represents third-party the New York City and Vicinity District Council of Carpenters (the "District Council" or the "Union"). We were surprised to read the letter filed yesterday by Alexander X. Saunders of Peckar & Abramson in response to our March 3, 2015 letter to Your Honor requesting a referral to Magistrate Judge Cott for an in camera review of documents of the District Council's Inspector General. Last Wednesday, February 25, Mr. Saunders wrote to us that "[w]e are in agreement with your proposal to submit for in camera review the documents you withheld under the 'law enforcement privilege.' Please proceed with advising the court and submit the subject documents for review as soon as possible." We then followed up with the Court appointed Independent Monitor, Glen G. McGorty, and the Union's special counsel, Barbara S. Jones, and filed our letter on Tuesday. With respect to complying with the five third-party subpoenas, we produced 2,538 pages of documents, along with the privilege log, on the agreed date of February 17. We have, as is our obligation, continued to review the Union's paper and electronic files, providing supplemental productions on March 2 and 4, 2015 of an additional 238 pages of documents. We are prepared to proceed promptly with the review of the Inspector General's documents.

Respectfully submitted,

Spivak Lipton LLP  
Attorneys for the New York City and Vicinity  
District Council of Carpenters

BY:

  
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United States District Judge  
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cc: **BY E-MAIL**

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